



(no subject)

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Thank you for providing dates for depositions in our call this morning. I did not want to have to write to the Court again to ask you to respond to such a simple request.

David Orland is available on October 23 for his deposition. I hope to have a date for Norman Raju's deposition by tomorrow.

I am available on October 29 or 30 for Mr. Kamens' deposition but, as I explained in our court conference on October 4, I need Mr. Kamens' discovery responses before his depositions. Please let me know when you intend to serve responses to the request for documents (none were served by the Court ordered date of October 11) and responsive answers to interrogatories. As I already advised you in a prior correspondence, Mr. Kamens' answers to interrogatories were entirely deficient, directing Third-Party Defendants' to his initial disclosures in response to each and every interrogatory.

Thank you,
Diane

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